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6 *In Propria Persona*



UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

TODD R. G. HILL, et al.,

Plaintiffs

vs.

THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW, et al.,

Defendants.

CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

The Hon. Josephine L. Staton
Courtroom 8A, 8th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

AMENDED PLAINTIFF'S MOTION FOR
IMMEDIATE RULINGS ON OUTSTANDING
REQUESTS FOR JUDICIAL NOTICE
(DOCKETS 197 & 199) AND
RECONSIDERATION OF MAGISTRATE'S
RECOMMENDATION OF DISMISSAL
WITH PREJUDICE

NO ORAL ARGUMENT REQUESTED

PLAINTIFF'S MOTION FOR IMMEDIATE RULINGS ON OUTSTANDING REQUESTS
FOR JUDICIAL NOTICE (DOCKETS 197 & 199) AND RECONSIDERATION OF
MAGISTRATE'S RECOMMENDATION OF DISMISSAL WITH PREJUDICE

CASE 2:23-CV-01298-CV-BFM

1 **PLAINTIFF'S MOTION FOR IMMEDIATE RULINGS ON OUTSTANDING REQUESTS**
2 **FOR JUDICIAL NOTICE (DOCKETS 197 & 199) AND RECONSIDERATION OF**
3 **MAGISTRATE'S RECOMMENDATION OF DISMISSAL WITH PREJUDICE**

4 TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
5 RECORD:

7 Plaintiff respectfully moves this Court to immediately rule upon Plaintiff's outstanding
8 Requests for Judicial Notice (Dockets 197 and 199), which have remained unresolved despite their
9 clear relevance and procedural necessity. The Court's continued failure to address these motions
10 substantively prejudices Plaintiff's claims and violates fundamental principles of procedural fairness
11 and due process.

14 The Magistrate Judge recently recommended dismissal of Plaintiff's claims with prejudice
15 (Docket 213), despite the absence of explicit rulings on critical evidentiary submissions in Dockets
16 197 and 199. These submissions directly bear upon Plaintiff's constitutional and procedural claims,
17 offering substantial evidence of systemic governance failures, procedural irregularities, and due
18 process violations by Defendants.

21 Moreover, Plaintiff notes that the Magistrate's Interim Recommendation to dismiss with
22 prejudice neglects to consider the binding constitutional framework outlined in *Students for Fair
23 Admissions v. Harvard*, 600 U.S. 181 (2023), despite Plaintiff's explicit request (Docket 232) and
24 this Court's own acknowledgment of the authority's relevance. While formal judicial notice of

27 **PLAINTIFF'S MOTION FOR IMMEDIATE RULINGS ON OUTSTANDING REQUESTS**
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 MAGISTRATE'S RECOMMENDATION OF DISMISSAL WITH PREJUDICE

1 published case law may be unnecessary, explicit acknowledgment and substantive consideration of its
2 controlling authority remains imperative to the constitutional claims presented.
3

4 The Court's persistent delay in addressing Dockets 197 and 199, coupled with the
5 Magistrate's recommendation of dismissal with prejudice, materially prejudices Plaintiff's right to
6 procedural fairness and substantive constitutional review. Plaintiff respectfully asserts that continued
7 avoidance of these rulings undermines public trust, transparency, and judicial fairness, creating
8 potential appellate risks and further complicating procedural management.
9

10 Plaintiff therefore respectfully requests:

- 11 1. An immediate and explicit ruling by this Court on Plaintiff's Requests for Judicial Notice
12 (Dockets 197 and 199).
13 2. Explicit substantive consideration of Plaintiff's constitutional claims, including the strict
14 scrutiny analysis mandated by *Students for Fair Admissions v. Harvard*, 600 U.S. 181 (2023).
15 3. A reconsideration of the Magistrate Judge's recommendation for dismissal with prejudice
16 pending resolution of the above outstanding evidentiary and constitutional matters.

17 Plaintiff respectfully submits these requests to ensure procedural fairness, transparency, and
18 adherence to constitutional principles fundamental to the proper administration of justice.
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**PLAINTIFF'S MOTION FOR IMMEDIATE RULINGS ON OUTSTANDING REQUESTS
FOR JUDICIAL NOTICE (DOCKETS 197 & 199) AND RECONSIDERATION OF
MAGISTRATE'S RECOMMENDATION OF DISMISSAL WITH PREJUDICE**

1 Respectfully submitted,
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3 Dated: March 10, 2025
4 Respectfully submitted,

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7 Todd R. G. Hill
8 Plaintiff, Pro Se
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10 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**
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12 The undersigned party certifies that this brief contains 360 words, which complies with the 7,000-
13 word limit of L.R. 11-6.1.

14 Respectfully submitted,

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16 March 10, 2025
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18 Todd R.G. Hill
19 Plaintiff, in Propria Persona
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21 **Plaintiff's Proof of Service**
22

23 This section confirms that all necessary documents will be properly served pursuant to L.R. 5-
24
25 3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a
26

27 **PLAINTIFF'S MOTION FOR IMMEDIATE RULINGS ON OUTSTANDING REQUESTS
28 FOR JUDICIAL NOTICE (DOCKETS 197 & 199) AND RECONSIDERATION OF
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CASE 2:23-CV-01298-CV-BFM

1 document causes a “Notice of Electronic Filing” (“NEF”) to be automatically generated by the
2 CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court
3 and (2) all pro se parties who have been granted leave to file documents electronically in the case
4 pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service
5 through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P.
6 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal
7 Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.
8
9 Respectfully submitted,

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14 March 10, 2025
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16 Todd R.G. Hill
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18 Plaintiff, in Propria Persona
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**PLAINTIFF’S MOTION FOR IMMEDIATE RULINGS ON OUTSTANDING REQUESTS
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